

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: { CHAPTER 13
KENNETH G. COOK, {
DEBTOR, { CASE NO. 18-53572-PMB
{

**CHAPTER 13 TRUSTEE'S SUPPLEMENTAL OBJECTION TO
CONFIRMATION AND MOTION TO DISMISS**

COMES NOW MELISSA J. DAVEY, Chapter 13 Trustee, and objects to confirmation of the plan and files this motion to dismiss under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The Amended Chapter 13 Plan is ineffective and cannot be administered by the Chapter 13 Trustee because it fails to correctly identify the amended Plan sections (3.1) as required by NDGA Bankruptcy Court General Order 21-2017.

WHEREFORE, the Trustee moves the Court to inquire into the above objections at the separately scheduled and notice confirmation hearing, deny confirmation of the Chapter 13 Plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

June 11, 2018.

/s/William A. Bozarth
William A. Bozarth, Attorney for
Chapter 13 Trustee
GA Bar No. 940530

18-53572-PMB

CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR:

Kenneth Gregory Cook
5771 Southland Walk
Stone Mountain, GA 30087

ATTORNEY FOR DEBTOR:

Slipakoff & Slomka, PC
Overlook III - Suite 1700
2859 Paces Ferry Rd, SE
Atlanta, GA 30339

the above in the foregoing matter with a copy of this pleading by depositing same in the United States Mail in a properly addressed envelope with adequate postage thereon.

This 11th day of June, 2018.

/s/William A. Bozarth
William A. Bozarth, Attorney for
Chapter 13 Trustee
GA Bar No. 940530

Melissa J. Davey, Chapter 13 Trustee
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